

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MATTHEW ADKISSON, an individual,

Plaintiff,

v.

EPIK HOLDINGS, INC., a Washington
Corporation; EPIK INC., a Washington
Corporation; MASTERBUCKS LLC, a
Wyoming company; ROBERT W.
MONSTER, an individual; and BRIAN
ROYCE, an individual,

Defendants.

No. 2:23-cv-00495 MJP

DECLARATION OF DEBRA ELLIOTT

I, Debra Elliott, declare:

1. I am the founder and director of Life Light Create, LLC, a South Dakota company. Life Light is a full-service, one-stop shop for website design and development needs.
2. Life Light first began to use Epik’s domain registrar services in August 2021. As of January 2023, Life Light had a portfolio of approximately 300 domain names registered using Epik’s registrar services. One of the services offered by Epik is to renew domain names for a small fee before they “expire.” This is meant to ensure that a third party is not able to buy the domain name after it expires. This is an ordinary service offered by domain name registrars.

1 3. In or around March 2023, I paid a total of \$314.67 to Epik to renew
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3 approximately eighteen domain names. However, the domain names I paid Epik to renew were
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5 not renewed. On March 25, 2023, I notified Epik that the domain names I paid to renew were not
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7 being renewed. I then kept notifying them of this issue over the next several days, flagging that
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9 the domain name registrations were expiring soon. Despite notifying Epik of the issue, multiple
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11 of the domain names expired after I had paid to renew them. As a result of Epik not renewing the
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13 domain names, I transferred the domain name portfolio to a new registrar, incurring over \$2,500
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15 in fees. This loss has directly affected my business, and caused me immense frustration.

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17 4. When I contacted Epik for a refund because of their failure to renew the domain
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19 names, instead of providing a refund, Epik provided only in-store credit.
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23 **I declare under penalty of perjury that the foregoing**
24 **is true and correct.**

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26 EXECUTED this 26th day of May, 2023.

27 DocuSigned by:

28 *Debra Elliott*

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30 Debra Elliott
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